

Appl. No. 10/027,686
Amdt. Dated 03/05/2004
Reply to Office Action of 02/23/2006

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REMARKS

This Amendment is in response to the Office Action mailed December 4, 2006. In the Office Action, claims 1-20 were rejected under 35 U.S.C. §103(a). Applicants respectfully traverse these rejection and request reconsideration of the allowability of claims 1-20.

Request for Examiner's Interview

The Examiner is respectfully requested to contact the undersigned attorney listed below if after review, such claims are still not in condition for allowance. This telephonic conference would greatly facilitate the examination of the present application. The undersigned attorney can be reached at the telephone number listed below.

Rejection Under 35 U.S.C. § 103

Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shah (U.S. Patent No. 6,292,832) in view of Still (U.S. Patent No. 6,718,390) and Beckerman (U.S. Patent No. 6,029,200). Applicants respectfully traverse the rejection because a *prima facie* case of obviousness has not been established.

As the Examiner is aware, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. *See MPEP §2143; see also In Re Fine, 873 F. 2d 1071, 5 U.S.P.Q.2D 1596 (Fed. Cir. 1988).* Herein, the combined teachings of the cited references fail to describe or suggest all of the claim limitations.

For instance, as set forth in independent claim 1, Applicants respectfully submit that neither Shah, Still nor Beckerman, alone or in any combination, teach or suggest the translation of a plurality of *relative links* into a corresponding plurality of *absolute links* that...point to the *local domains associated* with at least two of the plurality of *personal content directors*. *Emphasis added.* Each absolute link is a *superset of a corresponding relative link by further including a domain name.* *Emphasis added.*

Applicants respectfully disagree with the Office Action that states that Beckerman teaches "a system that takes a hyperlink and responds with absolute links in the form of a reference file, that file contains a plurality of absolute links which correspond to one or more servers that contain the same resource." *See Page 3 of the Office Action.* Rather, Beckerman teaches the retrieval of a reference file that includes a list of resource specifiers that point to a potential source of streaming data content. *See column 5, lines 55-61 of Beckerman.* Beckerman is directed to teaching of the supply of multiple links, but is inconsistent with the claimed invention where the absolute links are generated for RTT calculation purposes on subsequent accesses to retrieve content associated with the absolute links.

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Moreover, Applicants respectfully submit that neither Shah, Still nor Beckerman, alone or in combination, teaches or suggests the operation of (i) downloading content including the plurality of absolute links to a client, and (ii) *determining a most proximate local domain for a client based on subsequent accesses to download data accessible by selection of the absolute links of the downloaded content. Emphasis added.*

Hence, Applicants respectfully request withdrawal of the outstanding §103(a) rejection as applied to claim 1.

With respect to independent claims 7 and 13, Applicants respectfully submit that neither Shah nor Still, alone or in combination, teach or suggest (1) the translation of a plurality of relative links as well as *calculating a return trip time (RTT) value based on subsequent selection of an absolute link pointing to the local domain of the personal content director, and (iv) reporting the RTT value to a second personal content director that controls redirection of subsequent Hypertext Transfer Protocol (HTTP) GET requests (claim 7) or (2) a first personal content director (PCD) of the at least two PCDs that is adapted to translate the relative links associated with the web page into corresponding absolute links that uniquely point to local domains associated with both of the at least two PCDS. Emphasis added.* The processor of the first PCD is to *receive the RTT value measured by a second PCD for use in redirection of subsequent request for content by the client. Emphasis added.*

Applicants respectfully request that the Examiner withdraw the outstanding §103(a) rejection as applied to independent claims 7 and 13.

Furthermore, based on the dependency of claims 2-6, 8-12 and 14-20 on independent claims 1, 7 and 13, which are believed by Applicants to be in condition for allowance, no further discussion as to the grounds for traverse is warranted. Applicants reserve the right to present such arguments in an Appeal is warranted. Withdrawal of the §103(a) rejection as applied to claims 2-6, 8-12 and 14-20 is respectfully requested.

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Conclusion

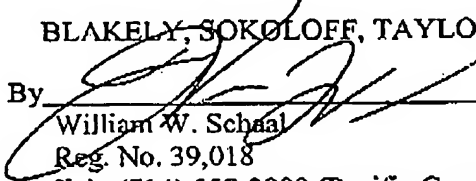
In view of the remarks made above, it is respectfully submitted that pending claims 1-20 define the subject invention over the prior art of record. Thus, Applicants respectfully submit that all the pending claims are in condition for allowance, and such action is earnestly solicited at the earliest possible date.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: March 5, 2007

By


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Susan McFarlane

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